

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.**

In the Matter of)	
)	
Inquiry Regarding Carrier Current)	ET Docket No. 03-104
Systems, including Broadband over Power)	
Lines Systems)	

REPLY COMMENTS OF VERIZON¹

The comments in this proceeding reveal a broad consensus that the Commission should encourage the deployment of Broadband over Power Line (“BPL”) technology. Most commenters agree that BPL has the potential to compete head-to-head with other broadband services. There is also general agreement that BPL may potentially interfere with a range of communications services, from radio to voice to DSL to cable modem broadband services. These comments reinforce that the wisest course for the Commission is to encourage the development and deployment of BPL, with minimal regulation, but to wait to revise Part 15 rules until after industry standards have been set by an ANSI-accredited standards organization.

Most commenters acknowledge that BPL will be a key player in the broadband marketplace, but consumers will receive the full benefit of true competition only if all broadband providers are allowed to operate in an environment of minimal regulation and regulatory parity. The Commission can best deliver these benefits first by classifying all broadband services under Title I of the Act and second by ensuring that all broadband providers – regardless of the underlying technology – are treated the same.

¹ The Verizon telephone companies are the local exchange carriers affiliated with Verizon Communications Inc. listed in Attachment A.


A number of commenters also recognize that interference from BPL is a serious concern. Many commenters note that BPL has the potential to interfere with a number of other technologies, including telephony, DSL, cable TV, cable modem services, and radio. *See, e.g.*, Amherst Alliance Comments at 2-9; Information Technology Industry Council Comments at 3-7; Institute of Electronic and Electrical Engineers Comments at 3-5; Qwest Comments at 3-4; Sprint Comments at 3. Several commenters note that despite extensive trials of BPL in Europe, the service has not been deployed because of concerns over interference caused by radiated emissions. *See, e.g.*, Information Technology Industry Council Comments at 7. Clearly, there is a real possibility that BPL will interfere with other services, although it is too early to determine the scope of this potential interference.

Some commenters wrongly downplay the possibility that BPL will interfere with voice and DSL services because the frequency spectrums do not overlap. *See, e.g.*, Electric Broadband Comments at 7; HomePlug Powerline Alliance Comments at 7; Main.net Comments at 6. But, as Verizon stated in its initial comments, it is the close proximity of BPL equipment to telecommunications equipment that may cause interference with voice and DSL. BPL may also potentially interfere with the next generation of DSL technology, VDSL or Very High Bit Rate Digital Subscriber Line service, which does overlap with the frequency spectrum used for BPL. Verizon Comments at 5-6. Without the benefit of objective, industry-wide standards for BPL, however, it is impossible to know with certainty whether BPL will generate this kind of interference. The Commission should hold off on any judgments on the interference potential of BPL until the standards setting process is complete.

As Verizon emphasized in its initial comments, these standards should be set by an ANSI-accredited standards organization through a process open to all interested parties. The standards setting process should include the development of a measurement and assessment program that will evaluate the effects of the electromagnetic environment caused by BPL on telecommunications and cable TV systems. Verizon Comments at 6-7.

Although some commenters discount this possibility, *see* Electric Broadband Comments at 6-7, once standards are set, it may be necessary for the Commission to revise its Part 15 rules. For example, the Commission may need to revise Part 15 in order to define frequency spectrums BPL must avoid to prevent interference or to limit emissions in certain spectrums.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Kathleen M. Grillo', written over a horizontal line.

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THE VERIZON TELEPHONE COMPANIES

The Verizon telephone companies are the local exchange carriers affiliated with Verizon Communications Inc. These are:

Contel of the South, Inc. d/b/a Verizon Mid-States
GTE Midwest Incorporated d/b/a Verizon Midwest
GTE Southwest Incorporated d/b/a Verizon Southwest
The Micronesian Telecommunications Corporation
Verizon California Inc.
Verizon Delaware Inc.
Verizon Florida Inc.
Verizon Hawaii Inc.
Verizon Maryland Inc.
Verizon New England Inc.
Verizon New Jersey Inc.
Verizon New York Inc.
Verizon North Inc.
Verizon Northwest Inc.
Verizon Pennsylvania Inc.
Verizon South Inc.
Verizon Virginia Inc.
Verizon Washington, DC Inc.
Verizon West Coast Inc.
Verizon West Virginia Inc.